



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

First named inventor: **Henry Haverinen**
App. Serial No.: **10/659,774**
Filed: **Sept. 10, 2003**
Title: **METHOD AND APPARATUS ENABLING REAUTHENTICATION IN
A CELLULAR COMMUNICATION SYSTEM**
Group Art Unit: **2153**
Examiner: **Thomas J. Dailey**

PRE-APPEAL BRIEF REQUEST FOR REVIEW

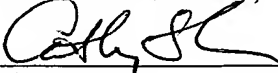
Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In response to the final Office Action of January 4, 2011, please reconsider the rejections
in view of the following remarks:

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service
on the date shown below with sufficient postage as first class mail in an envelope addressed to:
Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450


Cathy Sturmer

Dated: 8/23/11

REMARKS

Claims 1, 4, 7, 10, 13-15, 20-21 and 24-29 were examined by the Office, and in the Office Action of July 7, 2010 all claims are rejected. With this response no claims are amended, added or cancelled. Applicant respectfully submits that the Office has committed clear error in rejecting the claims, because the Office has failed to show that the cited references disclose or suggest all of the limitations recited in the claims. Accordingly, applicant respectfully requests reconsideration and withdrawal of the rejections in view of the following discussion.

This response is submitted along with a Notice of Appeal.

Claim Rejections Under § 103

In section 8, on page 5 of the Office Action, claims 1, 4, 7, 10, 13-15, 20-21 and 24-29 are rejected under 35 U.S.C. § 103(a) as unpatentable over O'Neill (U.S. Appl. Publ. No. 2003/0176188) in view of Westerdal (U.S. Appl. Publ. No. 2002/0133719). Applicant respectfully submits that claim 1 is not disclosed or suggested by the cited references, because the cited references fail to disclose or suggest all of the limitations recited in claim 1. The cited references, alone or in combination, at least fail to disclose or suggest transmitting a reauthentication identity to a terminal in response to a request for full authentication, as recited in claim 1.

The Office acknowledges on page 6 of the Office Action, that O'Neill does not disclose the transmission to the terminal of the reauthentication identity is in response to a request for full authentication of the terminal, and relies upon Westerdal for this teaching. However, applicant respectfully submits that O'Neill also does not disclose or suggest transmitting to a terminal a reauthentication identity. Instead, O'Neill only discloses that the mobile node may send an identity to the network, since message 550 is directed towards the Remote Home Agent 112 of the MN 202 in the home domain 1102, but it is first sent to the access router 128 as message 550a and it is then sent to the remote home agent 112 as message 550b. See O'Neill paragraph [0053]. The message 550 includes a network access identifier having a user part and a realm part, however the message 550 is sent towards the Remote Home Agent 112, and therefore is not transmitted to the terminal, as recited in claim 1. It is understood that the Network Access Identifier (NAI) is a way of identifying users who request access to a network, and a user may

provide the NAI to the network when first accessing a network. Therefore, applicant respectfully submits that O'Neill does not disclose or suggest that the terminal has a reauthentication identity transmitted to the terminal, as recited in claim 1. For at least this reason, claim 1 is not disclosed or suggested by the cited references.

Furthermore, applicant respectfully submits that Westerdal fails to make up for the deficiencies in the teachings of O'Neill identified by the Office. Westerdal is directed to a system that facilitates sharing authentication information between a plurality of servers, a first server directs a client to communicate a first identity to an authentication server, so that the authentication server can attempt to associate the first identifier with a known client. See Westerdal Abstract. However, Westerdal is completely silent regarding reauthentication. Furthermore, Westerdal does not disclose or suggest that a reauthentication identity includes a unique realm name uniquely identifying the authentication server, or that the request for reauthentication is routed to the authentication server according to the unique realm name included in the request for reauthentication, as recited in claim 1. Instead, Figure 3 of Westerdal shows a process for associating client (102) with an authentication server cookie (107). In this process, client (102) sends an authentication identity (AID) to authentication server (112). If the authentication server (112) determines that a cookie contains a known authentication server identifier, then the client (102) is known to the authentication server (112). See Westerdal paragraph [0036]. However, if the cookie does not contain a known authentication server identifier, the authentication server (112) generates a new authentication server identifier for the client (102). See Westerdal paragraph [0037]. However, the cookies do not contain a unique realm name as recited in claim 1, and they are not transmitted in response to a request for full authentication. Accordingly Westerdal fails to make up for the deficiencies in the teachings of O'Neill identified by the Office. Therefore, for at least the reasons discussed above, claim 1 is not disclosed or suggested by the cited references.

Independent claims 4, 10, 13, 15, 20 and 27 include limitation similar to those recited in claim 1. Therefore, for at least the reasons discussed above with respect to claim 1, these independent claims are not disclosed or suggested by the cited references.

The claims rejected above and depending from the above mentioned independent claims, are not disclosed or suggested by the cited references at least in view of their dependencies.

In section 16, on page 9 of the Office Action, claims 14 and 21 are rejected under 35 U.S.C. § 103(a) as unpatentable over O'Neill in view of Westerdal and Barriga-Caceres et al. (U.S. Appl. Publ. No. 2003/0163733). Claims 14 and 21 ultimately depend from an independent claim, and Barriga-Caceres fails to make up for the deficiencies in the teachings of O'Neill and Westerdal identified above. Therefore, claims 14 and 21 are not disclosed or suggested by the cited references at least in view of their dependencies.

Conclusion

For at least the foregoing reasons applicant respectfully submits that the present application is in condition for allowance, and such action is earnestly solicited. The Commissioner is hereby authorized to charge to Deposit Account No. 23-0442 any fee deficiency required to submit this paper.

Respectfully submitted,

Date: 23 March 2011



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